



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

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November 20, 2015

Mr. Kurt Reynolds
WestRock-Southern Container, LLC
51 Independence Drive
Devens, MA 01432

RE: Devens
Transmittal No.: X267519
Application No.: CE-15-018
Class: *NM50*
FMF No.: 341235
AIR QUALITY PLAN APPROVAL

Dear Mr. Reynolds:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Limited Plan Application (“Application”) submitted under Transmittal No. X267519. This Application concerns the proposed alteration and operation of the flexographic printing equipment at your corrugated container manufacturing facility located at 51 Independence Boulevard in Devens, Massachusetts (“Facility”). It amends Plan Approval Transmittal No. X239314.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-O, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

A. HISTORY

In 2000 RockTenn – Southern Container Corporation, LLC [“RockTenn”] constructed a building on the property designated as 51 Independence Boulevard in Devens for the purpose of producing corrugated board and boxes.

On February 23, 2001, MassDEP issued Plan Approval #W016754 for corrugated container manufacturing at the Facility. On August 16, 2002, MassDEP issued Plan Approval #W026028, which replaced Plan Approval #W016754. Both of these Plan Approvals limited emissions of Volatile Organic Compounds (“VOC”) from flexographic printing on containers to less than one ton per year.

On April 23, 2013, MassDEP issued Plan Approval No. X239314 to the Permittee for an increase in the printing VOC emissions limit from one to five tons per year and a new facility-wide VOC emissions limit of 9.5 tons per year. This Plan Approval also established Hazardous Air Pollutant (“HAP”) limits for the printing equipment as well as new Facility Wide limits for both VOC and HAP.

On August 28, 2015, the Permittee submitted a letter notifying MassDEP that the name of the Permittee was going to change from Rock-Tenn to WestRock.

On September 25, 2015, the Permittee submitted the present application Transmittal No. X267519.

B. PROJECT DESCRIPTION

The Permittee proposes to remove certain printing equipment and install new printing equipment. The currently approved equipment consists of two flexo folder gluers, two flexo printer slotters and two rotary die cutters. The two existing flexo folder gluers and one of the rotary die cutters will be removed, and one new Evol 100 flexo folder gluer will be installed. The Evol 100 will be more efficient and use less water than the equipment it replaces. The Evol 100 will have a dust removal system call a MistClone that will have an exhaust directed inside the plant next to the Evol, and so does not require plan approval. The various materials used on the printing equipment, including inks, coatings, and adhesives, contain VOC and HAP. The VOC and HAP are emitted as fugitive emissions and exhausted from the general building ventilation. The Permittee is not proposing any changes in the previously approved operational/production limits or emission limits.

C. APPLICABLE REGULATORY REQUIREMENTS

1) Best Available Control Technology (BACT)

The Permittee proposes Best Available Control Technology (“BACT”) as a combination of low VOC inks, coatings, adhesives, and cleaning solutions, best management practices, and pollution prevention. The Permittee proposes to use inks and coatings which contain no more than 2.5 pounds VOC per gallon, less water, of product and adhesives which contain no more than 1.25 pounds VOC per gallon, less water, of product as applied. Ink that is left on the printing dies is cleaned with water. The ink solution is then sent to the Permittee’s waste water collection system. Occasionally another product, ECO-ICE, is used to obtain a better cleaning of the flexographic lines. (ECO-ICE replaces the previously used V-12 product.) According to the material safety data sheet (“MSDS”) for this product, ECO-ICE contains no VOC or HAP. MassDEP has determined that the Permittee’s proposed limits represent BACT for this application.

2) Federal Regulations

The flexographic printing operations are not subject to the Federal Regulation National Emission Standards for The Printing and Publishing Industry (U.S. EPA 40 CFR Part 63 Subpart KK), because the Facility is an area source of HAP pursuant to 40 CFR 63.820(a)(7).

This Plan Approval Transmittal No. X267519 amends and replaces Plan Approval Transmittal No. X239314 dated April 23, 2013.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU	Description	Design Capacity	Pollution Control Device (PCD)
5	Flexographic Printing & Cutting Station	NA	None

Table 1 Key:

EU = Emission Unit Number

PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

Table 2				
EU	Operational / Production Limit	Air Contaminant	Monthly Emissions Restrictions (TPM) (Note 1)	Annual Emission Limit (TPY) (Note 2)
5	385,000 pounds/year & 40,000 pounds/month Ink 224,000 pounds/year & 22,000 pounds /month Adhesives	VOC	0.42	5.0
		HAP (single)	0.17	2.0
		HAP (total)	0.25	3.0
Facility- wide (Note 3)		VOC	0.80	9.5
		HAP (single)	0.17	2.0
		HAP (total)	0.25	3.0

Table 2 Notes:

1. Based on a calendar month total.
2. Based on a 12-month rolling total. Compliance with a 12 month rolling total is determined each month by adding the previous 11 months of VOC/HAP emissions to the current month and comparing the total to the limit specified above.

Facility-wide emissions include all operations at the Facility which emit VOC and HAP; these operations include, but are not limited to: boiler operations, miscellaneous heaters, and hand application of coating and application of cleanup solution.

Table 2 Key:

EU# = Emission Unit Number	pounds/year = gallons per consecutive 12-month period
HAP (single) = maximum single Hazardous Air Pollutant	TPM = tons per month
HAP (total) = total Hazardous Air Pollutants	TPY = tons per consecutive 12-month period
pounds/month = gallons per calendar month	VOC = Volatile Organic Compounds

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5:

Table 3	
EU	Monitoring and Testing Requirements
5	1. The Permittee shall install monitoring equipment or emission monitoring systems for the purpose of documenting compliance with this Plan Approval.
	2. At a minimum, the Permittee shall monitor the quantity of ink, coating, adhesive, and cleaning solution usage and associated emissions from the flexographic printing station on a weekly basis.
Facility-wide	3. The Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	4. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13.

Table 3 Key:

EU = Emission Unit Number

USEPA = United States Environmental Protection Agency

Table 4	
EU	Record Keeping Requirements
5	1. The Permittee shall establish and maintain on-site a record-keeping system. All records shall be maintained up-to-date such that twelve-month rolling period information is readily available for MassDEP examination. The rolling period is determined for each consecutive twelve month period (current month plus prior eleven months).

Table 4

EU	Record Keeping Requirements
5	<p>2. The Permittee shall maintain the following records on site for a period of five (5) years:</p> <p>A. Compliance records sufficient to demonstrate that emissions have not exceeded what is allowed by this Plan Approval. Such records may include daily production records, raw material usage rates, emissions test results, monitoring equipment data and reports. Specifically this Facility must record/maintain the following:</p> <ol style="list-style-type: none"> 1) The identity and quantity of all inks and adhesives used on a monthly basis. The record shall also indicate the percentage of VOC and/or HAP in each product. 2) An up-to-date MSDS for each ink and adhesive used at the Facility. 3) A comprehensive and up-to-date list of all inks and adhesives used or currently in use at the Facility. 4) Calendar Month total VOC and HAP emissions. Calculations shall include emissions from inks and adhesives applied and evaporative losses from cleanup operations performed. 5) Twelve-month rolling period of total VOC and HAP emissions. Calculations shall include emissions from inks and adhesives applied and evaporative losses from cleanup operations performed. 6) Twelve-month rolling period quantity of all inks and adhesives used. Calculations shall be made on a calendar month basis. <p>B. Maintenance: A record of routine maintenance activities performed on each emission unit, control equipment and monitoring equipment including, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.</p>
Facility-wide	<p>3. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping.</p> <p>4. In accordance with 40 CFR 63.829(d), the owner or operator of each facility which commits to the criteria of §63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material.</p> <p>5. The Permittee shall maintain records of monitoring and testing as required by Table 3.</p> <p>6. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.</p>
Facility-wide	<p>7. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.</p>

Table 4	
EU	Record Keeping Requirements
Facility-wide	8. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	9. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	10. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	11. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:

EU = Emission Unit Number
HAP = Hazardous Air Pollutant
PCD = Pollution Control Device

SOMP = Standard Operating and Maintenance Procedure
VOC = Volatile Organic Compounds
USEPA = United States Environmental Protection Agency

Table 5	
EU	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Central Regional Office of MassDEP, BAW Permit Chief by telephone (508)767-2845, email, CERO.AIR@massmail.MA.US or fax (508) 292-7621, as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to same as above Permit Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.
	4. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	5. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.

Table 5 Key:

EU = Emission Unit Number

BAW = Bureau of Air and Waste

CMR = Code of Massachusetts Regulations

4. **SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee is subject to and shall comply with the Special Terms and Conditions as contained in Table 6:

Table 6	
EU	Special Terms and Conditions
5	1. The Permittee shall meet the as applied VOC content MassDEP BACT limit requirements, expressed in pounds per gallon, less water for inks and adhesives. Inks shall contain no more than 2.5 pounds VOC per gallon of product, less water and adhesives shall contain no more than 1.25 pounds VOC per gallon, less water as applied.
	2. The Permittee shall employ all reasonable management practices to minimize VOC and HAP emissions from its process operations. The Permittee shall keep any containers containing VOC and HAP materials tightly covered as much as practical during use and at all times when not being used. The Permittee shall take all reasonable steps to prevent spills by instituting proper material handling techniques and good housekeeping practices.
5	3. Prior to use of new or reformulated ink or adhesive formulations, the Permittee must submit a new application and obtain written MassDEP approval, except when the use of the new formulation or reformulation meets all of the following, the Permittee shall keep on-site: <p>A. An up-to-date Department form BWP AQ Coating & Inks (Supplemental form for VOC usage), or equivalent, Raw Material List, and Manufacturer's MSDSs are kept on-site;</p> <p>B. The VOC content of the new formulation or reformulation does not exceed the as-applied VOC BACT content limit of 300 grams of VOC per liter (2.5 pounds of VOC per gallon) for inks and coatings, less water <u>and</u> VOC BACT content limit of 125 grams VOC per liter (1.25 pounds of VOC per gallon) for adhesives, less water, contained in this Plan Approval;</p>
Facility-wide	4. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.

Table 6 Key:

BACT = Best Available Control Technology

MSDS = Material Safety Data Sheet

EU = Emission Unit Number
HAP = Hazardous Air Pollutant

VOC = Volatile Organic Compound

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.

- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with

the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Enclosed is a stamped approved copy of the application submittal.

Should you have any questions concerning this Plan Approval, please contact Paul Dwiggins by telephone at 508-767-2760, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Roseanna E. Stanley
Permit Chief
Bureau of Air and Waste

Enclosure

ecc: Neil Angus, Devens Enterprise Commission
MassDEP/Boston - Yi Tian
Robert Wood, Westrock